

DEPARTMENT OF THE AIR FORCE

UNITED STATES CENTRAL COMMAND AIR FORCES (USCENTAF) SHAW AIR FORCE BASE, SOUTH CAROLINA

10 Sep 2003

MEMORANDUM FOR CENTAF MEDICAL UNITS

FROM: CENTAF/AUAB-SG (Lt Col Smallwood)

SUBJECT: Policy for Documentation of Occupational and Environmental Conditions and Exposures

- 1. This policy (a) directs CENTAF Medical Units to generate a site Environmental and Occupational Health Workplace Exposure Data (EOHWED) summary and place a copy into each members' deployed medical record, (b) directs Bioenvironmental Engineering (BE) use of the Global Expeditionary Medical System (GEMS), (c) establishes new BE industrial hygiene program instructions, and (d) provides direction for documentation of deployment-site environmental conditions in an Environmental Health Site Assessment (EHSA). Implementation is necessary to meet the deployed health surveillance requirements of Presidential Review Directive 5 (PRD-5) and JCSM-0006-02, *Updated Procedures for Deployment Health Surveillance and Readiness*, dated 1 Feb 02. Execution of these actions will optimize and standardize the collection, storage and retrieval of health and environmental hazard information for our deployed troops and maximize force health protection in the field.
- 2. **BE Industrial Hygiene Guidance**. The AFMOA/CC letter, *Interim Guidance BE Industrial Hygiene Program*, dated 9 Apr 03 (Atch 1), standardizes procedures for collection, analysis, management and communication of occupational health information. We expect CENTAF sites to follow to the extent feasible the AFMOA guidance along with the supplemental CENTAF guidance (Atch 2). CENTAF/SG memo, *Industrial Hygiene Programs for CENTAF deployed Units*, dated 9 Jun 03 is rescinded.
- 3. **EOHWED Summary.** Each CENTAF medical unit will generate an EOHWED that summarizes general environmental and occupational health exposure data and associated health risks for the deployment site. The EOHWED will normally be a two-page document, generated by the Prevention and Aerospace Medicine (PAM) TEAM, that summarizes a more comprehensive EHSA (example is provided at Atch 3). Medical units will place a copy of the EOHWED into the deployment medical record prior to return of each deployed individual to home-station. When necessary, medical units will generate a separate OHWED to document workplace specific occupational exposures not covered in the EOHWED for applicable industrial workers. Atch 2, Para. 4.6.4. provides additional guidance.
- 4. **GEMS Theater Occupational Module and EBS (TOM-EBS) Program**. It is our expectation that CENTAF BE offices will immediately begin using GEMS for

documenting results of industrial hygiene surveys and environmental assessments performed in the field. BE offices are asked to enter existing data into the system, with the goal of having all current workplace and exposure data in the system by 31 Oct 03.

- a. **Installation, Training and Support**. GEMS 3.0, Build 2, has been distributed to every CENTAF medical site, and is now being used for reporting medical encounters and DNBI surveillance. TOM-EBS may be considered a far forward extension of the Command Core System, with which most BE personnel are familiar. The GEMS CD contains a training tool and a user's guide on the TOM-EBS module. Additionally, HQ ACC has established a GEMS-help desk, open 24-hours a day, seven days a week at DSN 596-5771 to support GEMS use in the field (GEMS CD provides additional information).
- b. **Reporting**. AFIOH and the CENTAF BEE will serve as central repositories for the TOM-EBS data. Beginning now, please submit an electronic export of the Industrial Hygiene and EBS export reports on the last day of each month. Send the files via NIPRNET to oehs@brooks.af.mil and bee@auab.aorcentaf.af.mil.
- 5. Environmental Health Site Assessment. The EHSA identifies and quantifies EOH hazards that pose potential risks at a deployment site and is accomplished as early as possible in the deployment process. CENTAF sites should follow procedures established in the *Air Force EHSA Guide* for conducting the EHSA (Atch 4) and use the TOM-EBS program for summarizing EHSA data. The PAM team must review and update, as necessary, EHSA information during each deployment. The BE staff is normally responsible for ensuring EHSA data is entered into TOM-EBS. Be aware that the Army or Navy may have performed environmental sampling at your site; you will want to incorporate any relevant information into your site's EHSA. We expect, by 30 Sep 03 medical units will have reviewed and updated the EHSA with existing data. Please provide to the CENTAF BEE, by this date, a prioritized list of any additional environmental sampling you believe necessary to finalize the EHSA for your site.
- 6. My point of contact is the CENTAF(F) Bioenvironmental Engineer, CENTAF(F)/SGB, DSN (318) 436-4112 or email bee@auab.aorcentaf.af.mil.

/// Signed///
TIMOTHY T. JEX, Col, USAF, MC, CFS
CENTAF Surgeon

Attachments:

- 1. AFMOA/CC Memo, 9 Apr 03
- 2. Supplemental IH Guidance
- 3. Example EOHWED
- 4. EHSA Guide

Attachment 2

Supplemental CENTAF Guidance and Clarification to AFMOA/SG Interim Guidance – Bioenvironmental Engineering (BE) Industrial Hygiene Program, dated 14 Mar 03

General. CENTAF BE offices will implement to the extent feasible requirements of the AFMOA Interim Guidance and this Supplement. Be aware that the contingency environment presents unique challenges... you will generally have limited time, limited manpower and limited equipment.

The focus of industrial hygiene in the deployed setting is the same as home station... ensuring a safe and healthy working environment and worker health protection. Because of the limitations stated above, it is important to emphasize the importance of using professional judgment, experience and previously published measurements to assess potential hazards. Reports to workcenter should be brief and practical (i.e. one page executive summary of findings with risk assessment report and compliance checklist). STRONGLY consider reporting via email versus formal memo. Recommended controls, similarly, must be practical for the deployed environment.

Within the first week of arrival at the deployed site, BE staff should conduct a quick "walk through visit" of all the major industrial workcenters. Picture the visit as a quick, informal "meet and great," broad brush look at the base, spending only a few minutes in each workcenter; versus a formalized "shop survey." The purpose is three-fold: (1) to obtain immediate "eyes-on" knowledge of the base, (2) to be able to effectively prioritize shops and /or activities for closer/more in-depth evaluation, and (3) to identify and correct any glaring unsafe work practices seen during the walk-through.

Due to the unique circumstances of the deployed environment, certain requirements outlined in the AFMOA guidance may be impractical or impossible to implement. The guidance with this supplement, however, establishes CENTAF's expectations on how industrial hygiene will ideally be performed in the field.

- 1.1.2. The "approved" Occupational Health management Information System (OHMIS) for CENTAF sites is the Global Expeditionary Medical System, Theater Occupational Module (GEMS-TOM).
- 2.6.3. Identify OHMIS deficiencies and/or recommendations for system improvement to the CENTAF(F) Bioenvironmental Engineer (BEE). Doing so is crucial, especially during the infancy stage of GEMS-TOM implementation, so that necessary changes to GEMS-TOM are identified and prioritized. The CENTAF(F) BEE will, in turn, prioritize and communicate deficiencies and recommendations to AFIOH and HQ ACC/SGPB for incorporation into future program upgrades.
- 4.1.2. Routine surveillance will be accomplished under the direction of the senior bioenvironmental engineering (BE) representative at the deployed site.

- 4.3.2. Senior BE representative, in coordination with the senior flight surgeon at the deployed site, should lead any briefings and/or meetings held with squadron/group commanders.
- 4.2.4. BE shall identify any requirements for additional manpower or equipment to the CENTAF(F) BEE. The CENTAF(F) BEE will coordinate equipment loan requirements between sites and purchase of any necessary additional equipment.
- 4.3.4.5.4. When identifying personal protective equipment (PPE) requirements and recommendations in the deployed setting, be sure to consider absence of engineering controls and increased workload. Since CENTAF workplaces may normally all be considered military unique, PPE requirements in 29 CFR 1910.132 only apply where feasible.
- 4.6.4 Environmental and Occupational Health Workplace Exposure Data (EOHWED). Each CENTAF medical unit will generate an EOHWED that summarizes general environmental/occupational health (EOH) exposure data and associated health risks for the deployment site. When necessary, medical units will generate for applicable industrial workers a separate OHWED to document separate occupational exposures not covered generally in the EOHWED.
- 4.6.4.1. The EOHWED will normally be a two-page document, generated by Preventive and Aerospace Medicine (PAM) Team, that summarizes a more comprehensive environmental baseline survey. The EOHWED will summarize potential EOH hazards to which all individuals at the deployment site would be considered similarly exposed and provide an assessment of health risk based on existing data. Examples of site potential hazards include, but are not limited to, exposure to airborne particulates, heat stress, noise from aircraft activity, depleted uranium, smoke from oil fires, smoke from general burning, biological hazards from sand flies carrying leishmaniasis, and airborne chemical exposure from nearby industrial facilities or landfills. Negative documentation, both quantitative and qualitative, is expected and encouraged. EHSA exposure assessments are expected to reference theater-wide studies (i.e. airborne particulate studies, leishmaniasis studies, depleted uranium, etc.) when available.
- 4.6.4.2. The EOHWED must be printed on a Standard Form 600 and contain a statement of purpose and message to the effect that the form has been officially sanctioned by CENTAF/SG and must be maintained with the DoD Form 2796, **Post Deployment Health Assessment**, in the individual's permanent medical record.
- 4.6.4.3. For individuals working in an industrial workplace, a separate OHWED, or addendum to the EOHWED described above, is required. The OHWED summarizes occupational exposure assessment data, identifies existing workplace controls, and provides an assessment of the adequacy of controls to protect the worker. Examples of workers who will require and OHWED include workers performing: (a) corrosion control (exposure to airborne volatile organics, metals, particulates from painting/sanding operations), entomology (exposure to airborne pesticides and confined space entry) and fire fighters (exposure to airborne smoke and chemicals, elevated heat stress and

ergonomic stress). The OHWED is used by home station units to identify applicable occupational medical examination requirements.

- 4.6.4.4. The PAM Team will review and update, as necessary, the EOHWED and separate OHWEDs (as applicable) at least once during each deployment rotation. The team must ensure the EOHWED accurately reflects current EOH exposure data and health risks for the deployment site.
- 4.6.4.5. Medical units will ensure a copy of the EOHWED is placed into the deployment medical record prior to return of each deployed individual to home-station. The separate OHWED if applicable, should similarly be placed in the medical record or otherwise transferred to the worker for placement into the medical record upon return to home station. Home-station units will in-turn incorporate these documents into the individuals permanent medical record.
- 4.6.4.6. Provide a copy of the EOHWED, and any updated versions, to the CENTAF(F) BEE and CENTAF(F) Public Health Officers.
- 5.1. Notify the CENTAF(F) BEE as soon as practical, but within 72 hours of any sample result that exceeds a permissible exposure level or otherwise represents a significant threat to human health. Notification should provide details and outline projected actions.
- 5.2. Measurements and sampling of industrial hazards should be accomplished to the extent possible. However, if time and/or resources are not available, professional judgment, experience, and previously published measurements will be necessary to assess potential hazards.
- 6.1.2. The senior BE representative at the deployed site will serve as the "qualified reviewer," and is responsible for certifying the PPE listing in accordance with AFOSH Standard 91-501, *AF Consolidated Occupational Safety Standard*.
- 6.3.3. Electronic download of the GEMS EBS and Industrial Hygiene export data will be provided monthly to AFIOH at gems@brooks.af.mil, with courtesy copy to the CENTAF(F) BEE at bee@auab.aorcentaf.af.mil.